#### DEPARTI INT OF ENVIRONMENTA **MANAGEMENT**

#### **INDIANAPOLIS**

# OFFICE MEMORANDUM

DATE:

THRU:

May 16, 1989

TO:

Johnson Controls, Inc. RCRA File

IND 009549593, Goshen, Elkhart County

Bruce Kizer 5/18 QBN

FROM:

Ted Warner TW

Compliance Monitoring Section

SUBJECT: Trip Report for the Scheduled Inspection of

March 22, 1989

EPA Region 5 Records Ctr.



On March 22, 1989, I conducted an unannounced compliance evaluation inspection at Johnson Controls Inc., located at 1302 East Monroe Street, Goshen, Indiana. The facility was represented by Messrs. Emery Lee Heck, Environmental Coordinator; Larry Martin, Hazardous Waste Material Handler; Art Holtzinger, Maintenance Forman; and Ms. Marilyn Kritzman, Secretary and Manifest Processor.

Johnson Controls, Inc., manufactures and distributes automatic control devices. The principal processes are machining, stamping, molding, plating, painting and light assembly with related generation of hazardous waste.

## Preinspection File Audit

Mv preinspection file's audit revealed that Johnson Controls, Inc., is in the Part B permitting process. Their Part B was called in on May 25, 1988, by our Plan Review and Permit Section. There has been the exchange of several letters between our office and Johnson Controls, Inc., attempting to resolve the regulatory status of the facility. My discussions with the staff of our Plan Review and Permit Section indicated that formal closure may be required for some storage units listed on the original Part A permit application. The final decision has not been made regarding questionable units.

At the present time Johnson Controls, Inc., is operating as a container storage and large quantity generator facility. The hazardous waste codes listed on their Part A include F001, 2, 5 and 6 and P106 and 121 and U002, 145, 031, 220, 226, 228, 080 and 239. Their container storage capacity is listed as 10,560 gallons or 192 full 55 gallon containers. The facility was last inspected on October 21, 1986, with a resultant Notice of Violation. Notice of Violation was resolved on September 25, 1987, with a Letter of Compliance from our office.

## Inspection Findings

My inspection revealed that Johnson Controls, Inc., is operating as a container storage facility and a large quantity generator of F001, 2, 5 and 6 hazardous waste. It was pointed out by Johnson Controls, Inc., representatives that the overall plan for the facility is to not obtain a Part B permit, rather to routinely remove all hazardous waste from the facility in less than ninety (90) days. This plan has not been implemented as of the date of this inspection.

Johnson Controls Inc. Page 2

I found no evidence of violations during my site audit. The container storage building contained 117 fifty-five (55)-gallon containers well under the maximum interim status allowable quantity of 192. The containers were in good condition and the storage building was well maintained. There were no waste solvents in the accumulation area because the waste is generated only at the end of each shift.

The review of the required documents also revealed no violations. The TSD RCRA inspection report forms provide more detailed information.

# Conclusions and Recommendations

As a result of this inspection I will prepare a Letter of Compliance for our staff's consideration.

TFW/bja

May 2, 1989